

Commonwealth of Kentucky
Division for Air Quality
STATEMENT OF BASIS / SUMMARY

Conditional Major, Operating
Permit: F-20-016
D&B Truck & Equipment Sales, LLC
1059 Glover Road
Glasgow, KY 42141
May 4, 2020

Jonathon Hughes, Reviewer
SOURCE ID: 21-009-00112
AGENCY INTEREST: 163173
ACTIVITY: APE20200002

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SECTION 1 – SOURCE DESCRIPTION

SIC Code and description: 3713, Truck and Bus Bodies

Single Source Det. ☐ Yes ☒ No If Yes, Affiliated Source AI:

Source-wide Limit ☒ Yes ☐ No If Yes, See Section 4, Table A

28 Source Category ☐ Yes ☒ No If Yes, Category:

County: Barren

Nonattainment Area ☒ N/A ☐ PM₁₀ ☐ PM_{2.5} ☐ CO ☐ NO_x ☐ SO₂ ☐ Ozone ☐ Lead

If yes, list Classification:

PTE* greater than 100 tpy for any criteria air pollutant ☐ Yes ☒ No

If yes, for what pollutant(s)?

☐ PM₁₀ ☐ PM_{2.5} ☐ CO ☐ NO_x ☐ SO₂ ☐ VOC

PTE* greater than 250 tpy for any criteria air pollutant ☐ Yes ☒ No

If yes, for what pollutant(s)?

☐ PM₁₀ ☐ PM_{2.5} ☐ CO ☐ NO_x ☐ SO₂ ☐ VOC

PTE* greater than 10 tpy for any single hazardous air pollutant (HAP) ☒ Yes ☐ No

If yes, list which pollutant(s): Xylene

PTE* greater than 25 tpy for combined HAP ☒ Yes ☐ No

*PTE does not include self-imposed emission limitations.

Description of Facility:

Facility sells used construction equipment along with straight trucks. Also rebuilds and refurbishes semi-trucks.

SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM

Permit Number: F-20-016

Activities: APE20200002

Received: April 7, 2020

Application Complete Date: April 28, 2020

Permit Action: ☒ Initial ☐ Renewal ☐ Significant Rev ☐ Minor Rev ☐ Administrative

Construction/Modification Requested? ☐ Yes ☒ No

Previous 502(b)(10) or Off-Permit Changes incorporated with this permit action ☐ Yes ☒ No

Description of Action:

Initial operating permit for an already existing facility.

F-20-016 Emission Summary		
Pollutant	2019 Actual (tpy)	PTE F-20-016 (tpy)
CO	N/A	0.07
NO _x	N/A	0.09
PT	N/A	5.26
PM ₁₀	N/A	2.35
PM _{2.5}	N/A	2.34
SO ₂	N/A	0
VOC	N/A	22.4
Lead	N/A	0
Greenhouse Gases (GHGs)		
Carbon Dioxide	N/A	103
Methane	N/A	0.002
Nitrous Oxide	N/A	0.002
CO ₂ Equivalent (CO ₂ e)	N/A	104
Hazardous Air Pollutants (HAPs)		
Xylenes	N/A	19.8
Toluene	N/A	2.01
Ethyl Benzene	N/A	3.91
Naphthalene	N/A	0.394
Combined HAPs:	N/A	26.8

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

Emission Unit #01 Spray Coating Booth Emission Unit #02 Spray Gun Cleanout				
Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis	Compliance Method
HAP	Source wide 9/22.5 tpy Single/Combined	401 KAR 52:030	Material Balance & MSDS	Recordkeeping, 12 month rolling total
PM	2.34 lbs/hr	401 KAR 59:010, Section 3(2)	Material Balance & MSDS with 60% Transfer Efficiency	Dry Filters, 90% C.E., Manufacturer's guarantee
Opacity	20%	401 KAR 59:010, Section 3(1)	N/A	Weekly visual observation
Naphthalene	Source Wide 0.193 tpy	401 KAR 63:020	Material Balance & MSDS	Recordkeeping, 12 month rolling total
Ethyl Benzene	Source Wide 2.61 tpy	401 KAR 63:020	Material Balance & MSDS	Recordkeeping, 12 month rolling total

Initial Construction Date: 2010

Process Description:

HVLP spray gun with a throughput of 2.00 ounces per minute to do touch up work on equipment. Also applies touch up paint using spray paint can.

Applicable Regulations:

401 KAR 59:010, This regulation is applicable to each affected facility, associated with a process operation, which is not subject to another emission standard with respect to particulates, commenced on or after July 2, 1975.

401 KAR 63:020, Potentially hazardous matter or toxic substances

Non-applicable Regulations:

401 KAR 63:002, Section 2(4)(iiii) 40 C.F.R. 63.11169 to 63.11180, Table 1 (Subpart HHHHHH), National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources is not applicable since the coatings do not use the target HAPs.

401 KAR 63:002, Section 2(4)(vvvvv) 40 C.F.R. 63.11514 to 63.11523, Tables 1 to 2 (Subpart XXXXXX), National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

Comments:

Coating used is an Acrylic Modified Alkyd Enamel for the spray gun & Stop Rust Gloss Black Enamel for the spray paint can. 401 KAR 59:225, New miscellaneous metal parts and products does not apply since the source is located in a county designated attainment for ozone and is not a major source of VOC emissions. Spray gun uses a 1.4 mm nozzle and a one liter reservoir cup. A lower throughput of around 1 gal/hr is expected since it's used only for touch up work and due to limitations of the cup size.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)

Testing Requirements\Results

N/A

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS

Table A - Group Requirements:

Emission and Operating Limit	Regulation	Emission Unit
9.0 tpy of individual HAP emissions	To preclude major source status for HAP	Source-wide
22.5 tpy of combined HAP emissions	To preclude major source status for HAP	Source-wide
0.193 tpy of Naphthalene emissions	To comply with 401 KAR 63:020	Source-wide
2.61 tpy of Ethyl Benzene emissions	To comply with 401 KAR 63:020	Source-wide

Table B - Summary of Applicable Regulations:

Applicable Regulations	Emission Unit
401 KAR 63:020, <i>Potentially hazardous matter or toxic substances.</i>	01 & 02
401 KAR 59:010, <i>New process operations</i>	01

Table C - Summary of Precluded Regulations:

N/A

Table D - Summary of Non Applicable Regulations:

Non Applicable Regulations	Emission Unit
401 KAR 63:002, Section 2(4)(iiii) 40 C.F.R. 63.11169 to 63.11180, Table 1 (Subpart HHHHHH), National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources is not applicable since the coatings do not use the target HAPs.	01
401 KAR 63:002, Section 2(4)(vvvvv) 40 C.F.R. 63.11514 to 63.11523, Tables 1 to 2 (Subpart XXXXXX), National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories	01

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS (CONTINUED)

Air Toxic Analysis

401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*

The Division for Air Quality (Division) has performed AERMOD on May 1, 2020 of potentially hazardous matter or toxic substances (Ethyl Benzene, Naphthalene) that may be emitted by the facility based upon the process rates, material formulations, stack heights and other pertinent information provided by the applicant. Based upon this information, the Division has determined that the conditions outlined in this permit will assure compliance with the requirements of 401 KAR 63:020. See limits for Naphthalene and Ethyl Benzene in Section 4 of this document and Section D of the operating permit.

Single Source Determination

N/A

SECTION 5 – PERMITTING HISTORY

Permit	Permit type	Activity#	Complete Date	Issuance Date	Summary of Action	PSD/Syn Minor
N/A	N/A	N/A	N/A	N/A	N/A	N/A

SECTION 6 – PERMIT APPLICATION HISTORY

N/A

APPENDIX A – ABBREVIATIONS AND ACRONYMS

AAQS	– Ambient Air Quality Standards
BACT	– Best Available Control Technology
Btu	– British thermal unit
CAM	– Compliance Assurance Monitoring
CO	– Carbon Monoxide
Division	– Kentucky Division for Air Quality
ESP	– Electrostatic Precipitator
GHG	– Greenhouse Gas
HAP	– Hazardous Air Pollutant
HF	– Hydrogen Fluoride (Gaseous)
MSDS	– Material Safety Data Sheets
mmHg	– Millimeter of mercury column height
NAAQS	– National Ambient Air Quality Standards
NESHAP	– National Emissions Standards for Hazardous Air Pollutants
NO _x	– Nitrogen Oxides
NSR	– New Source Review
PM	– Particulate Matter
PM ₁₀	– Particulate Matter equal to or smaller than 10 micrometers
PM _{2.5}	– Particulate Matter equal to or smaller than 2.5 micrometers
PSD	– Prevention of Significant Deterioration
PTE	– Potential to Emit
SO ₂	– Sulfur Dioxide
TF	– Total Fluoride (Particulate & Gaseous)
VOC	– Volatile Organic Compounds